



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

November 12, 1991

SUBJECT: Palmerton site: alleged errors in toxicological analyses

FROM: Roy L. Smith, Ph.D.  
Senior Toxicologist (3HW15)

TO: Cynthia Nadolski  
3RC20

Please place this memo in the administrative record for the Palmerton site, preferably as an attachment to Bruce Conrad's letter to Pat McManus, dated November 6, 1991, in which Mr. Conrad alleges that my toxicological report of October 15 contained errors. I know of no errors of fact or calculation in the report. Mr. Conrad apparently referred to slightly imprecise wording in the summary section, which read "above 10  $\mu\text{g}/\text{dl}$ ", but should have read "above the CDC 10  $\mu\text{g}/\text{dl}$  criterion". Since the report had already clearly stated the source of the criterion, this imprecision hardly constitutes an error. All other issues which Mr. Conrad discussed with me during several telephone conversations (in late October, 1991) concerned differences in interpretation of data and treatment of uncertainty. My failure to agree with his positions on these issues also does not constitute an error. If he has found genuine errors in the report, he has not informed me of them.

cc: Pat McManus (3HW22)  
Tony Koller (3HW22)  
Jerry Heston (3HW32)  
Terry Stilman (3HW33)  
Fran Burns (3HW01)

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